

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MOTION TO CONTINUE SENTENCING AND DATE FOR FILING
OBJECTIONS TO THE PRESENTENCE REPORT

Defendant, Trevor Charlton, moves to continue his sentencing, which is presently scheduled for March 11, 2008, for approximately eight weeks until May 5, 2008, or another date thereafter that is convenient for the court. He further moves that the date by which he must file objections to the presentence report be moved to three weeks prior to the sentencing. As grounds for this motion, counsel states that there are voluminous records which need to be collected which are material to sentencing and she needs additional time to review all of this material. Counsel also needs additional time to research the guideline issues and adequately prepare for sentencing. The Probation department has ascertained that defendant, who is 32 years old, is facing a guideline sentence of 235-293 months (19 years 7 months - 24 years 5 months) and a minimum mandatory sentence of 180 months (15 years). Defense counsel requests that the sentencing be continued in order that the court will be as fully informed about the defendant as possible prior to sentencing.

The government by Assistant United States Attorney Robert Richardson assents to this motion.

TREVOR CHARLTON
By his attorneys,

/s/ Catherine K. Byrne
Catherine K. Byrne
B.B.O. # 543838

/s/ Stylianus Sinnis
Stylianus Sinnis
B.B.O. # 560148
Federal Defender Office
408 Atlantic Ave., 3rd Floor
Boston, MA 02110
Tel: 617-223-8061

Certificate of Service

I, Catherine K. Byrne, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 20, 2008.

/s/ Catherine K. Byrne
Catherine K. Byrne